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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Petition to Amend Part 68 of the)
Commission's Rules to Include)
Terminal Equipment Connected to)
Basic Rate Access Services)
Provided via Integrated Services)
Digital Network Access Technology)

RM-7815

COMMENTS

BellSouth Corporation and its operating telephone companies, South Central Bell Telephone Company and Southern Bell Telephone and Telegraph Company ("BellSouth"), respectfully respond to the above-styled Petition for Rulemaking ("Petition") filed by Southwestern Bell Telephone Company ("Southwestern Bell") on August 23, 1991.¹ For the reasons stated below, BellSouth supports Southwestern Bell's request for the initiation of a rulemaking proceeding.

Through its Part 68 rules and terminal equipment registration requirements,² the Commission ensures that properly registered terminal equipment connected to the public network does not cause harm to the network.³

¹ The Commission requested comments on Southwestern Bell's Petition by Public Notice dated October 7, 1991.

² 47 C.F.R. Sections 68.1 et seq.

³ Harm to the network encompasses "[e]lectrical hazards to telephone company personnel, damage to telephone company equipment, malfunction of telephone billing equipment, and (continued...)

Southwestern Bell proposes that the Commission add to its Part 68 rules provisions to include terminal equipment connected to a two wire basic rate access ("BRA") interface provided by Integrated Services Digital Network ("ISDN") technology. BellSouth agrees with Southwestern Bell that modification to the Part 68 rules is appropriate and necessary to ensure that such ISDN terminal equipment is subject to the registration process so that it does not cause network harm.

Only recently has the industry, through the American National Standards Institute ("ANSI"), adopted a standard for BRA ISDN.⁴ With the adoption of this standard, one may expect a proliferation of terminal equipment that conforms to the standard. Yet, the standard itself carries no enforcement authority. Hence, the weight of the Commission's rules is a desirable complement to the voluntary standard.⁵

³(...continued)
degradation of service to persons other than the user of the subject terminal equipment, his calling or called part." 47 C.F.R. Section 68.3.

⁴ ANSI T1.601, 1988, Integrated Services Digital Network -- Basic Access Interface for Use on Metallic Loops for Application on the Networks Side of the NT (Layer 1 Specification).

⁵ In light of recent public reports of major service disruptions, it is critical that the industry not rely on terminal equipment manufacturers' compliance with voluntary standards as the sole guard against potential network harm.


As Southwestern Bell points out, its petition is based on the ANSI standard. To ensure that the agreed upon voluntary standard does become the enforceable standard, the Commission may wish to refer to ANSI T1.601 as the requisite physical layer interconnection. This approach carries the added benefit of minimizing any potential regulatory delays or confusion that otherwise might arise if the Part 68 rules needed to be specifically modified to parallel any future modifications to the industry standard.

Conclusion

For the foregoing reasons, BellSouth supports Southwestern Bell's petition for initiation of a rulemaking proceeding to adopt terminal equipment interconnection requirements for the BRA ISDN interface.

Respectfully submitted,

BELLSOUTH CORPORATION,
SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY, and
SOUTH CENTRAL BELL
TELEPHONE COMPANY

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Date: November 7, 1991

CERTIFICATE OF SERVICE

I hereby certify that I have this 7th day of November, 1991 serviced all parties to this action with a copy of the foregoing COMMENTS by placing a true and correct copy of same in the United States mail, postage prepaid, addressed to:

Bruce E. Beard
Southwestern Bell Telephone Company
1010 Pine Street, Room 2114
St. Louis, Missouri 63101

Gay Fidelibus
Gay Fidelibus